

Accreditor Dashboards Sub-Committee Report and Recommendations to NACIQI

Background

At our February 2022 committee meeting, it was suggested that we form a sub-committee of interested members to follow up on the Committee's utilization of the Accreditor Dashboards as well as the specific discussion items about the dashboards from the July 2021 meeting. Wally Boston volunteered to chair the sub-committee.

Prior to their first meeting, members of the sub-committee were given a copy of the whitepaper recommending the creation of the accreditor dashboard as a pilot project for the June 2016 NACIQI meeting. We reviewed with members of the Department the origination of the dashboards, the utilization of the dashboards by the Department, the suspension of the dashboards, and the reinstitution of the dashboards. With the reinstated dashboards, the pilot was assumed reactivated.

The sub-committee members reviewed at length the dashboards available in the Spring of 2022 and were advised how the Department's reviewers use them. We learned that the Department's reviewers have access to more material than NACIQI members due to privacy rules and regulations that prevent certain data from being distributed outside of the Department. Some of that information is more current than the dashboard information which is updated annually.

The four foci of the original pilot project were:

1. General performance and outcomes of the institutions the agency accredits
2. Decision activities of and data gathered by the agency
3. Standards and practices with regard to student achievement
4. Agency activities in improving program/institutional quality

It was noted by our sub-committee that the pilot and current dashboards comprise data correlated with Focus #1. ***There was consensus that the process of gathering the dashboard data, processing it, publishing the dashboards, and our ability to utilize them as part of our (NACIQI's) agency reviews were important items for our review and discussion.***

Data related to the other three foci are collected by the Department but were not published on the dashboards when our sub-committee began its review activities and are still not published on the dashboards. ***For our next steps, we recommend that the sub-committee work with the Department on items related to focus #2, decision activities of and data gathered by the agency, and focus #3, standards and practices with regard to student achievement.*** The sub-committee members should consider which agency decision activities are most important to report annually (e.g., number of institutional affiliations renewed, number of institutions placed on probation, number of institutions removed from affiliation, etc.) as well as other data gathered by the agency. While the Department may not prescribe standards for student achievements, agencies do establish such standards (with the involvement of their institutions). Focus #3 dashboard items could include professional exam pass rates (e.g., NCLEX exam pass rates for nursing) and job placement rates if the agency requires and monitors them. ***We recommend creating a process for determining the appropriate data, collecting the data, and submitting it to the director responsible for dashboard publication.***

Focus #1, *General performance and outcomes of the institutions the agency accredits*, states that NACIQI will make use of information about the general performance of the institutions an agency accredits and originally included the specific metrics listed below (this information is drawn from the College Scorecard).

- % of Pell eligible
- % of Pell completers
- Graduation rates (as appropriate, the 3, 4, 6-year completion metrics)
- Debt incurred by students graduating from the accredited programs/institutions
- Avg. net price of institutions
- Repayment and default rates of the students graduating from the accredited programs/institutions.

Recommendation to include data from graduate programs and earnings data from all available completers

Early on in its review, some Sub-committee members asked the Department (1) if data related to graduate degrees could be included in the dashboards, (2) if the dashboards' data could include data from all completers, not just those students/graduates who borrowed federal loans, and (3) if the ratio of debt to net earnings for all completers could be included.

We were informed that (1) data related to graduate degrees could be included, and (2) data for all available completers (subject to IRS privacy restrictions) could be included. At the same time, we were advised that some programs may have data suppressed from as many as 60 percent of the colleges offering those programs if the number of program graduates from specific colleges falls below the minimum IRS privacy threshold. We believe the sub-committee should continue to work with the dashboard director to determine how to flag programs with a low reporting percentage. ***The sub-committee received draft dashboards including debt to earnings ratios too late to include in the July 22 dashboards but recommends their inclusion in the July 23 dashboards publication.***

Recommendation to indicate significant fluctuations in key metrics from year-to-year

Sub-committee members asked if the dashboards could be designed to “flag” changes (positive and negative) from year-to-year for specific metrics. We were informed that indicating changes from year-to-year is feasible, but the sub-committee must provide guidance regarding (1) which metrics are to be flagged for changes as well as (2) the percentage change up or down that will trigger a flagged indicator. ***The recommendation of which metrics should be flagged when significant changes occur from year-to-year was suspended until the sub-committee received feedback from the committee regarding our recommendations and proposed actions.*** The members discussed what options are available to request an inquiry to an agency based on a negative metric change in a year or years when the agency is not up for review. The point is considered moot until the metrics to be flagged are specified along with the negative percentage change that would trigger the notation.

Recommendation to include dashboard overview in new member orientation and training

During our initial review and analysis of the dashboards, it was noted that the Cheat Sheet, README, and Summary Dashboards are appropriately placed at the front of the package. Readers should review

these before reviewing the dashboards for the individual agencies. The Summary Dashboard for All Currently Operating Institutions of Higher Education displays where the cuts are made for the national quintiles for the Graduation & Earnings, Loan Performance, and Debt & Net Price sections that are utilized in all dashboards.

The Summary Dashboards for Primarily Bachelor's Institutions, Primarily Associate's Institutions, and Primarily Certificate Institutions provide a useful breakout for those distinctive institutions as compared to the All Currently Operating Institutions of Higher Education dashboard. There are 251 graduate certificate/degree only institutions not represented in the Primarily "XX" Institution dashboards. These institutions will be represented in a separate dashboard at the next dashboard publication date in July 2023. The Institutions with Greater than \$200 Million in Title IV Federal Student Aid dashboard lists each institution under its primary accrediting agency along with other metrics such as the number of undergrads, the percentage of those undergrads receiving Pell grants, the percentage of those undergrads who borrowed, the loan default rate percentage, the median completer borrower debt, the graduation rate, and median earnings for graduates. The sub-committee is comfortable at this time with the cutoff point of \$200 million for institutions listed. Increasing or decreasing that cutoff point in the future will not be difficult.

We recommend that new member training include a session about the dashboards, the specific metrics monitored, the frequency of publication, and the ability of the committee to make recommendations based on changes reported.

Recommendation to revise specialty program agency dashboards

During the review and discussion about the dashboards, it became evident that the dashboards for specialty program accreditors (many of the agencies reviewed by NACIQI) are not usable as currently constructed. There are explanations for this. First, many of the specialty accreditors are not the agency of record for federal student aid. In fact, many are the Title IV agency of record for a small percentage of the institutions that they accredit. Using the American Bar Association (ABA) as an example, its current dashboard reports 13 institutions versus the 199 institutions that its website reports as accredited as of January 31, 2023.

The ABA statistics relative to graduation, earnings, debt, and net price report "no data" in the July 2022 dashboard. Furthermore, the loan performance data reported only includes data from the 13 standalone institutions accredited by the ABA. Assuming the remaining 186 institutions participate in Title IV programs, the dashboard data without them is clearly not representative of the institutions and programs accredited by the ABA.

Second, and a related point, the dashboard is primarily institution-level data and therefore, it's of little use or importance when considering the effectiveness of a specialized agency that primarily accredits at the program level. Even if the Department provided the data at the Classification of Instructional Program (CIP) level, the data would not necessarily match the programs the specialized agency accredits.

The sub-committee discussed the various databases maintained by the Department to determine if a prototype dashboard could be built using program specific data that is a subset of the institutional data profiled on the other dashboards. We determined that the DAIP dataset has much of the data that we

were seeking. Specifically, the DAPIP dataset includes a field for each accreditor called “ProgramName” that is defined as “Name of Accredited Program.”

An associate of one of our members built several prototype program-specific dashboards using data available from the DAPIP database. Assumptions were made regarding which CIP codes should be linked to specific degree programs. A key finding during this process was that the DAPIP database and the FSA database are maintained separately by the Department and its contractors. CIP codes are maintained in the Federal Student Aid (FSA) database but not in the DAPIP database.

It was reported to the sub-committee that the contractor that maintains the DAPIP database informed the Department that adding a feature to link CIP code-related data from DAPIP to FSA would be out of the scope of the current dashboard contract. In addition, as noted above, the contractor did not want to assume responsibility for adding specific CIP codes to match the degree programs if the contract was reopened to consider this. ***Our sub-committee recommends that the Department arrange to link the CIP codes with the data in the DAPIP database. Furthermore, we recommend that an agreement be reached between the Department and the Agencies regarding which CIP code(s) to use for the degrees accredited by their agencies.*** This removes the risk of errors in judgement from the contractor or other Department employees and contractors.

In our most recent discussions with the Department, the Department is willing to determine the most likely match between Program Name and CIP code(s) for these specialty accreditor dashboards. Given that this matching process has not been performed in the past, it is not likely that all the specialty agency dashboards could be developed in time for the cutoff period for the next set of dashboards in July 2023. ***The sub-committee recommends prioritizing development of the specialty agencies’ dashboards in order of their next reviews with a goal that the agencies reviewed between July 2023 and June 2024 would have the revised dashboards available with the July 2023 publication.***

Recommend that committee members understand legal issues that may impact dashboard utilization in SDO decisions.

As the sub-committee wound up the bulk of the review and analysis of the dashboards, we held a virtual meeting with the Office of the General Counsel to discuss several questions posed by members. The questions were submitted in advance of the meeting. Three questions were answered during the meeting, and, for purposes of clarification, those answers were distributed to sub-committee members after the meeting in a memorandum whose distribution was limited to the Department of Education. At this point in time, we believe that our recommendations for improving the dashboards are congruent with our advisory role. We are also aware that NACIQI previously asked accrediting agencies under review to address a series of questions during NACIQI meetings. The Department published these questions in Federal Register Notices announcing the meetings. ***We recommend that all NACIQI members review this memorandum to guide their continued understanding and utilization of the dashboards.***

During our sub-committee’s discussions with representatives from the OGC, we noted that during the original pilot, NACIQI submitted a set of questions that they wanted each agency to answer at the upcoming meeting. ***Given that the dashboards will continue to evolve, we recommend that NACIQI resume the practice of submitting a set of questions to each agency to be answered at the next meeting.*** Those questions will also be published in the federal register.

In addition to the data complications that our sub-committee observed with the current dashboards, it is important to note that there are statutory restrictions that limit the Department's ability to utilize the data for recognition purposes (unless the datapoints are consistent with an agency's own student achievement standards). Assuming the sub-committee's recommendations are affirmed to continue working with the Department to achieve improvements and enhancements to the dashboards as it relates to all four foci, it will be important for NACIQI in its advisory role to consider recommending statute changes that would enable the use of data during the recognition process.

The sub-committee's dialogues with the Department have been very positive. In our last review meeting, we discussed the impact of the suspension of debt repayments due to the pandemic on several of the dashboard metrics. With no specificity as to the date that debt repayments will resume, ***the sub-committee recommends that the \$-based loan repayment rates, loan forbearance rates, and default rates be suspended for next summer's dashboard publication. Future publication of these rates will be determined based on when student loan repayments resume.***

If the recommendations related to the dashboards for specialty agencies are adopted by the Committee, we will know which changes can be added in time for the 2023 dashboards and which changes will have to wait until further approvals can be obtained.

The sub-committee would like to thank George Alan Smith, Brian Fu, Herman Bounds, and Angela Sierra for their collegial and positive interactions during our meetings and discussions.

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